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18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 CHARLES HAYES ,
21
22 Plaintiff,

23 vs.

24 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.
Defendants.

Case No.: 2:20-cv-02048-KJD-BNW

**STIPULATION TO EXTEND
BRIEFING SCHEDULE FOR LVMPD
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT [ECF Nos. 41,
42, 43]
(First Request)**

Defendants Las Vegas Metropolitan Police Department, Jennifer Wood, and Doris

Hearrington (collectively “LVMPD Defendants”), and Plaintiff Charles Hayes stipulate and agree to extend the briefing schedule for LVMPD Defendants’ Motions for Summary Judgment, (ECF Nos. 41, 42, 43):

Deadline	Current Date	New Date
Responsive Brief	September 6, 2022	September 13, 2022
Reply Brief	September 20, 2022	September 28, 2022

Good cause supports the limited requested extension of the briefing schedule because Plaintiff’s counsel is unavailable on dates immediately before the current Response deadline due to pre-planned continuing education training with his law firm, which will occur for 5 days from Thursday, September 1 – Monday, September 5, 2022. The requested extension of discovery deadlines in this case will allow Plaintiff to have the time to provide a meaningful opposition to the motions for summary judgment.

In sum, this request for an extension is made in good faith and joined by all the parties. Trial is not yet set in this matter. Accordingly, an extension will not delay the resolution of this case on its merits. And, since this request is a jointly submitted, neither party will be prejudiced.

1 Dated this ____ day of September, 2022.

Dated this ____ day of September, 2022.

2
3 /s/ Na'Shaun L. Neal

/s/

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14 **IT IS SO ORDERED.**

15 Dated this 8th day of September, 2022.

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18 **UNITED STATES DISTRICT JUDGE**